

# **EXHIBIT D**

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12 ROBERT HUNTER BIDEN

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

16 ROBERT HUNTER BIDEN, an individual.

**Plaintiff.**

18 | VS.

19 PATRICK M. BYRNE, an individual,

**Defendant..**

Case No. 2:23-cv-09430-SVW-PD

## **PLAINTIFF ROBERT HUNTER BIDEN'S TRIAL EXHIBIT LIST**

**Pretrial Conference:** July 21, 2025

**Time:** 3:00 p.m.  
**Jury Trial** July 29, 2025  
**Time:** 9:00 a.m.

Judge: Hon. Stephen V. Wilson,  
Ctrm. 10A

Pursuant to Fed. R. Civ. P. 16 and Local Rule 16-2.3, Plaintiff Robert Hunter Biden (“Plaintiff”) sets forth the following proposed exhibits for trial for purposes of the Final Pretrial Disclosures. Plaintiff expressly reserve the right to further amend the Trial Exhibit List to add documents obtained as a result of any additional discovery and as may be necessary for impeachment, rebuttal, or otherwise based upon the evidence adduced at trial.

**Case Title:** *Robert Hunter Biden v. Patrick M. Byrne*

**Case No:** 2:23-cv-09430-SVW-PD

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
11 12 13	1. Capitol Times Magazine, Issue 1, published on June 27, 2023 (RHB00001-99)		
14 15 16	2. Telegram post by Defendant Patrick Byrne on March 20, 2022, including associated comments (RHB00695)		
17 18 19	3. Telegram post by Defendant Patrick Byrne on April 7, 2022, including associated comments (RHB00696)		
20 21 22 23	4. Telegram post by Defendant Patrick Byrne on October 20, 2022 reposting post from Qtime Network, including associated comments (RHB00697)		
24 25 26	5. Telegram post by Defendant Patrick Byrne on December 12, 2022, including associated comments (RHB00698)		
27 28	6. X post by Defendant Patrick Byrne on		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	January 5, 2023, including associated comments (RHB00718)		
7.	X post by Defendant Patrick Byrne on January 7, 2023, including associated comments (RHB00721)		
8.	X post by Defendant Patrick Byrne on February 10, 2023, including associated comments (RHB00699)		
9.	X post by Defendant Patrick Byrne on February 12 2023, including associated comments (RHB00700)		
10.	X post by Defendant Patrick Byrne on February 24, 2023, including associated comments (RHB00701)		
11.	X post by Defendant Patrick Byrne on March 17, 2023, including associated comments (RHB00100, RHB00702)		
12.	X post by Defendant Patrick Byrne on March 28, 2023 (RHB00110, 150)		
13.	X post by Defendant Patrick Byrne on April 17, 2023, including associated comments (RHB00716)		
14.	X post by Defendant Patrick Byrne on May 10, 2023, including associated comments (RHB00720)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
15.	Screenshot of link to Defendant Patrick Byrne's May 10, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00186)		
16.	Screenshot of link to Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00187)		
17.	Transcript of Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00711-RHB00715)		
18.	Certified Transcript of Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i>		
19.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00101, 104)		
20.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00102-103, 112-117, 119)		
21.	Telegram post by Defendant Patrick Byrne on June 24, 2023, including associated comments (RHB00703)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
22.	X post by Defendant Patrick Byrne on June 25, 2023, including associated comments (RHB00719)		
23.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00151-152)		
24.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00153-155)		
25.	Telegram post by Defendant Patrick Byrne on June 28, 2023, including associated comments (RHB00157)		
26.	X post by Defendant Patrick Byrne on June 29, 2023, including associated comments (RHB00105-106)		
27.	Telegram posts by Defendant Patrick Byrne on July 4, 2023, including associated comments (RHB00156)		
28.	Telegram post by Defendant Patrick Byrne on July 5, 2023, including associated comments (RHB00158-161)		
29.	Telegram post by Defendant Patrick Byrne on July 6, 2023, including associated comments (RHB00162)		
30.	Telegram post by Defendant Patrick Byrne		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	on July 21, 2023, including associated comments (RHB00163-164)		
31.	Screenshot of link to Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00185)		
32.	Transcript of Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00722-RHB00789)		
33.	Certified Transcript of Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i>		
34.	Telegram post by Defendant Patrick Byrne on July 22, 2023, including associated comments (RHB00167)		
35.	Telegram post by Defendant Patrick Byrne on July 28, 2023, including associated comments (RHB00168)		
36.	Screenshot of link to Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i> (RHB00184)		

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37.	Transcript of Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i> (RHB00790-RHB00846)		
38.	Certified Transcript of Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i>		
39.	Telegram post by Defendant Patrick Byrne on September 17, 2023, including associated comments (RHB00169)		
40.	X post by Defendant Patrick Byrne on October 8, 2023 (RHB00147; Pg. 3 of Exhibit B to Plaintiff's Complaint)		
41.	X post by Defendant Patrick Byrne on October 8, 2023, including associated comments (RHB00146; Pg. 2 of Exhibit B to Plaintiff's Complaint)		
42.	X post by Rep. Eric Swalwell on October 8, 2023, including associated comments (RHB00143-145)		
43.	X post by @AzPinkLady on October 11,		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	2023, including associated comments (RHB00125-126)		
44.	X post by @AzPinkLady on October 11, 2023, including associated comments (RHB00128)		
45.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00141-142)		
46.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00148)		
47.	X post by Defendant Patrick Byrne on October 23, 2023, including associated comments (RHB00109)		
48.	October 26, 2023 Demand for Retraction Letter to Defendant Patrick Byrne, sent by Plaintiff's counsel of record (RHB00404-406)		
49.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00124, 149)		
50.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00102-103, 112-117, 119)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
51.	Truth Social post by @RickRichGuillot on November 9, 2023, including associated comments (RHB00171)		
52.	X post by Defendant Patrick Byrne on November 10, 2023, including associated comments (RHB00118, 137)		
53.	X post by Defendant Patrick Byrne on November 13, 2023, including associated comments (RHB00108, 132)		
54.	Screenshot of link to Defendant Patrick Byrne's November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled "Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE" (RHB00183)		
55.	Transcript of Defendant Patrick Byrne's November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled "Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE" (RHB00847-RHB00864)		
56.	Certified Transcript of Defendant Patrick Byrne's November 13, 2023 interview		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled “Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE”		
57.	X post by @AzPinkLady on November 14, 2023, including associated comments (RHB00129-131)		
58.	Telegram post by Defendant Patrick Byrne on December 5, 2023, including associated comments (RHB00166)		
59.	Transcript from George Berges’ January 9, 2024 Congressional Transcribed Interview with the House Committee on Oversight and Accountability and House Committee on the Judiciary (RHB00266-403)		
60.	January 9, 2024 Letter to Rep James Comer, Chairman of the House Committee on Oversight and Accountability, and Rep. Jim Jordan, Chairman of the House Committee on the Judiciary, from William Pittard, counsel for George Berges (RHB00407-410)		
61.	X post by @AzPinkLady on January 11, 2024 (RHB00134)		
62.	X post by @AzPinkLady on January 11,		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	2024 (RHB00135)		
63.	X post by Senator mark Kelly on January 11, 2024, including associated comments (RHB00136)		
64.	Telegram post by Scott Adams on February 4, 2024, including associated comments (RHB00165)		
65.	Truth Social post by Defendant Patrick Byrne on February 13, 2024, including associated comments (RHB00170)		
66.	Truth Social post by Defendant Patrick Byrne on February 22, 2024, including associated comments (RHB00172)		
67.	Text Thread between Defendant Patrick Byrne and Anil Anwar between March 16, 2024 to April 16, 2024 (Byrne_0000021)		
68.	April 1, 2024 Affidavit of John Moynihan (Byrne_000001-3)		
69.	X post by Defendant Patrick Byrne on April 8, 2024, including associated comments (RHB00717)		
70.	X post by Defendant Patrick Byrne on April 25, 2024 (RHB00107)		
71.	X post by @AzPinkLady on April 25, 2024, including associated comments		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	(RHB00127)		
72.	Telegram post by Defendant Patrick Byrne on June 5, 2024, including associated comments (RHB00704)		
73.	X post by @AzPinkLady on June 30, 2024 (RHB00133)		
74.	X post by Defendant Patrick Byrne on July 22, 2024, including associated comments (RHB00138-140)		
75.	August 9, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Interrogatories, Set One		
76.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's Interrogatories, Set Two		
77.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's Interrogatories, Set Three		
78.	September 9, 2024, emails between Plaintiff's counsel of record and Jared Roberts, attorney for Ret. Lt. Gen. Michael Flynn (RHB00506-508)		
79.	September 17, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents,		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	Set One		
80.	September 19, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Requests for Admissions, Set One		
81.	September 19, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests Admissions, Set Two		
82.	September 19, 2024 Letter to Capitol Times Media LLC from Plaintiff's counsel of record (RHB00445-505)		
83.	Telegram post by Defendant Patrick Byrne on October 7, 2024, including associated comments (RHB00705)		
84.	October 10, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set Three		
85.	October 10, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set Four		
86.	X post by Defendant Patrick Byrne on October 26, 2024, including associated comments (RHB00706)		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
87.	October 29, 2024 Screenshot of Defendant Patrick Byrne's X Profile (RHB00707)		
88.	October 29, 2024 Screenshot of website enemywithindocuseries.com (RHB00708)		
89.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>The Deep Rig: How Election Fraud Cost Donald J. Trump the White House, By a Man Who did not Vote for Him: (or what to send friends who ask "Why do you doubt the integrity of Election 2020"</i> , for sale on Amazon.com (RHB00710)		
90.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>Danger Close: Domestic Extremist #1 Comes Clean</i> , for sale on Amazon.com (RHB00709)		
91.	Defendant Patrick Byrne's book, including audio version, <i>Danger Close: Domestic Extremist #1 Comes Clean</i> , published on February 15, 2024 (RHB00509-RHB00694)		
92.	Truth Social post by @TXFreedom4Ever in 2023 (exact date unknown), including associated comments (RHB00173)		
93.	Truth Social post by @DEFCONMarine		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	in 2023 (exact date unknown), including associated comments (RHB00178)		
94.	Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)		
95.	Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)		
96.	Truth Social post by @cziggy218 in 2023 (exact date unknown), including associated comments (RHB00181)		
97.	Truth Social post by @nancydunks in 2023 (exact date unknown), including associated comments (RHB00182)		
98.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00174)		
99.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00176)		
100	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments		

Ex. No.	Description	Date Identified	Date Admitted
	(RHB00170)		
101	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00175)		
102	Remittance Advance Invoice from Simon & Schuster UK Ltd., dated September 4, 2021 (RHB00411)		
103	Royalty Statements from Simon & Schuster from March 2020 through September 2024 (RHB00412-443)		
104	Royalty Ledger from Book/Lab Literary Agency (date unknown) (RHB00444)		
105	Hunter Biden <i>Beautiful Things</i> Press Kit (RHB00189-265)		
106	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25”		
107	Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25” (RHB01413-1414)		
108	Audio Recording produced by Defendant		



<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
3	in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO- 2021-08-24-08-46-17”		
6	109 Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-24- 08-46-17” (RHB01415-1416)		
11	110 Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO- 2021-08-24-14-43-38”		
15	111 Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-24- 14-43-38” (RHB01417-1418)		
20	112 Defendant’s passport photographs produced by Defendant in discovery on November 4, 2024 (Byrne_0000024- Byrne_0000045)		
24	113 Defendant’s “medical notes” provided by Defendant via email on November 4, 2024		
26	114 Defendant’s American Express recorded from July 2023, produced by Defendant in		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	discovery on January 17, 2025 as (Byrne_0000046-Byrne_0000047)		
115	Defendant Patrick Byrne's responses to Rule 26 Initial Disclosures,		
116	Defendant Patrick Byrne's responses to Special Interrogatories		
117	Certified copy of the Order After Trial, <i>Nazerali v. Mitchell, et al.</i> No. S-116979		
118	Certified copy of Reasons for Judgment, <i>Nazerali v. Mitchell, et al.</i> No. S-116979		
119	IRS Amended 990 Form for The American Project for 2021		
120	IRS 990 Form for The American Project for 2021		
121	IRS 990 Form for The American Project for 2022		
122	US Securities and Exchange Commission Form 4 for Overstock.com, Inc., 9/18/2019		
123	X post by Defendant Patrick Byrne on January 10, re Com Glover and January 6 crowd		
124	Substack post by Defendant Patrick Byrne on January 10, re Comm. Glover and January 6 crowd		

Ex. No.	Description	Date Identified	Date Admitted
125	X post by Defendant Patrick Byrne on January 15 re we are undefeated		
126	X post by Defendant Patrick Byrne on January 22 re greatest patriots of our time		
127	X post by Defendant Patrick Byrne on January 25 re January 6		
128	X post by Defendant Patrick Byrne on January 28 re 2020 election		
129	X repost by Defendant Patrick Byrne on February 5 re government		
130	X post by Defendant Patrick Byrne on March 11 re rigging of Election 2020		
131	X repost of Jake Lang's January Political Prisoner post by Defendant Patrick Byrne		
132	"The Enemy Within" Docuseries by Patrick Byrne (2024).		
133	"The Deep Rig" Documentary by Patrick Byrne (2021).		
134	<i>US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation v. Patrick Byrne</i> Complaint Civil Action No. 1:21-cv--02131		
135	<i>US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting</i>		

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
	<i>Systems Corporation v. Patrick Byrne</i> Notice of Appeal Civil Action No. 1:21- cv--02131		

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